

**IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF MISSISSIPPI**

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**In re: John E. Fowler  
Donica S. King  
Debtor(s)**

**Chapter 13  
Case No. 12-13300**

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**MOTION TO REOPEN CHAPTER 13 CASE**

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This Court, upon motion and consent of the U.S. Trustee, finds as follows:

1. That Debtors filed for protection under Chapter 13 of the United States Bankruptcy Code on August 10, 2012 and received a discharge on February 15, 2018. The Final Decree/Order Closing Case was entered on June 5, 2018 (dkt#96).
2. Debtor(s) wish to reopen this case to file an Adversary Proceeding to determine validity, priority, and extent of the lien of the second mortgage of Nationstar Mortgage, LLC d/b/a Mr. Cooper.

**WHEREFORE DEBTOR PRAYS THAT:**

This Chapter 13 case be reopened to allow the debtors to file an Adversary Proceeding to determine validity, priority, and extend of the lien of the second mortgage of Nationstar Mortgage, LLC d/b/ Mr. Cooper and for such further relief as this Court deems appropriate.

Respectfully Submitted,

/s/ Kevin F. O'Brien  
Kevin F. O'Brien #10731  
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CERTIFICATE OF SERVICE

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The undersigned individual hereby certifies that he, on this 10<sup>th</sup>, day of September 2020, electronically delivered true and correct copies of the attached “Motion to Reopen Chapter 13 Case” to the following parties at the addresses below:

**U.S. Trustee**  
[Ustpregions05.ab.ecf@usdoj.gov](mailto:Ustpregions05.ab.ecf@usdoj.gov)

**Locke Barkley, Trustee**  
[sbeasley@barkley13.com](mailto:sbeasley@barkley13.com)

**Nationstar Mortgage, LLC d/b/a Mr. Cooper**  
c/o Corporation Service Company, registered agent  
7716 Old Canton Rd. Suite C.  
Madison, MS 39110

/s/ Kevin F. O'Brien  
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